

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh
Chapter 11

**FEBRUARY 2025 FEE STATEMENT OF RICHMAN & RICHMAN LLC
AS COUNSEL TO DEBTOR**

Applicant:	Richman & Richman LLC
Counsel for:	Wisconsin & Milwaukee Hotel LLC
Period for compensation and reimbursement:	February 1, 2025 through February 28, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$53,061.00
Amount of reimbursement expenses sought as actual, reasonable, and necessary:	\$0
Total interim approval requested:	\$53,061.00

Dated this 10th day of March 2025.

RICHMAN & RICHMAN
Attorneys for the Debtor

By: /s/ Eliza M. Reyes
Michael P. Richman
Claire Ann Richman
Eliza M. Reyes
122 W Washington Ave, Suite 850
Madison, WI 53703
Tel: (608) 630-899
Fax: (608) 630-8991
mrichman@RandR.law
crichman@RandR.law
ereyes@RandR.law

Richman & Richman LLC

122 W Washington Ave, Suite 850
Madison, WI 53703-2732

INVOICE

Invoice # 1340
Date: 03/10/2025
Due On: 04/09/2025

Wisconsin & Milwaukee Hotel LLC
c/o Jackson Street Management LLC
Attn: Mr. Edward G. Carow
731 N. Jackson Street, Suite 420, Milwaukee WI53202

Wisconsin & Milwaukee Hotel LLC/-2024.00023

Chapter 11

Type	Date	Notes	Timekeeper	Quantity	Rate	Total
Service	02/01/2025	1105 - Plan & Disclosures: Work on plan and disclosure statement	MPR	2.80	\$795.00	\$2,226.00
Service	02/02/2025	1105 - Plan & Disclosures: Further work on plan and disclosure statement (2.6); prep of detailed email to client team re summary of key points in plan and disclosure statement (.5)	MPR	3.10	\$795.00	\$2,464.50
Service	02/02/2025	1104 - DIP Financing / Cash Collateral: Review White Lodging motion for authority to use cash collateral to pay bonuses	MPR	0.30	\$795.00	\$238.50
Service	02/03/2025	1105 - Plan & Disclosures: Prepare ballot form for accepting or rejecting to Chapter 11 plan	DTF	0.30	\$250.00	\$75.00
Service	02/03/2025	1105 - Plan & Disclosures: T/conf w/ M. Flaherty re WL issues and disclosure statement (.2); followup email w/J. Cordova, M. Flaherty, R. Erkert, E. Carow and D. Friedland (.2)	MPR	0.40	\$795.00	\$318.00
Service	02/03/2025	1104 - DIP Financing / Cash Collateral: t/conf w/F. DiCastri re WL motion and budget matters	MPR	0.20	\$795.00	\$159.00
Service	02/03/2025	1105 - Plan & Disclosures: Continue working on Debtor's Disclosure Statement and Plan, including addressing treatment of real property taxes.	EMR	0.30	\$495.00	\$148.50
Service	02/04/2025	1104 - DIP Financing / Cash	DJC	1.20	\$225.00	\$270.00

		Collateral: Review case file Research standing issues Prepare basic template for objection to motion				
Service	02/04/2025	1105 - Plan & Disclosures: Zoom client meeting re plan and disclosure statement (.4); followup mtg/emails w/ E. Reyes and D. Friedland (.1)	MPR	0.50	\$795.00	\$397.50
Service	02/04/2025	1105 - Plan & Disclosures: Phone conference with Deborah Friedland regarding financial information for proposed Plan and Disclosure Statement (.4); phone conference with Bill Pedersen regarding preparation of preference analysis for proposed Plan and Disclosure Statement (.4).	EMR	0.80	\$495.00	\$396.00
Service	02/05/2025	1104 - DIP Financing / Cash Collateral: Research Standing to Move to Use Cash Collateral Draft Objection Template	DJC	1.10	\$225.00	\$247.50
Service	02/05/2025	1105 - Plan & Disclosures: Prepare ballot forms for accepting or rejecting to Chapter 11 plan to include Class 1 secured creditor Computershare	DTF	0.50	\$250.00	\$125.00
Service	02/05/2025	1104 - DIP Financing / Cash Collateral: Research standing issues	DJC	0.90	\$225.00	\$202.50
Service	02/05/2025	1105 - Plan & Disclosures: Further work on plan and disclosure statement	MPR	4.40	\$795.00	\$3,498.00
Service	02/05/2025	1105 - Plan & Disclosures: Several emails and phone calls, and review of financial information from, EA Group Professionals for inclusion in proposed Plan and Disclosure Statement.	EMR	1.50	\$495.00	\$742.50
Service	02/05/2025	1108 - Employment, Billing & Compensation: Phone conference and email exchange with Jordan Vorlob at Sikich LLC to obtain detailed invoice for services billed hourly for fee application.	EMR	0.40	\$495.00	\$198.00
Service	02/05/2025	1105 - Plan & Disclosures: Continue working on proposed Plan and Disclosure Statement, including review of financial information provided by EA Group Professionals for exhibits for Plan (1.5); several	EMR	3.80	\$495.00	\$1,881.00

		phone conferences and email exchanges with EA Group Professionals regarding financial information (.5); preparing revisions to Exhibit C - Allowed POC Chart (.8); preparing revisions to Exhibit D - Preference Analysis (.2); and preparing and revising sample ballots (.8)				
Service	02/06/2025	1105 - Plan & Disclosures: Further revise and update Class 1 ballot to accept or reject Plan for Computershare and draft ballots for additional classes	DTF	0.50	\$250.00	\$125.00
Service	02/06/2025	1104 - DIP Financing / Cash Collateral: Research cash collateral budget issues; Research cash collateral disclosure requirement; Draft objection to White Lodging's Motion to Use Cash Collateral	DJC	2.80	\$225.00	\$630.00
Service	02/06/2025	1104 - DIP Financing / Cash Collateral: Continue drafting Objection to White Lodging's Motion to Use Cash Collateral	DJC	4.10	\$225.00	\$922.50
Service	02/06/2025	1110 - Claim Management Issues: Review the Claim 11 Chart	JOO	0.60	\$195.00	\$117.00
Service	02/06/2025	1105 - Plan & Disclosures: Further work on disclosure statement (3.0); Email to R. Bader re plan qs and to E. Reyes re ballots (.2); zoom mtg w/D. Friedland, W. Peterson, J. Cordova re various plan questions/issues (.2); work on edits to contract sections of disclosure statement and plan (.2); further revisions to claim amounts and disclosures (1.0)	MPR	4.60	\$795.00	\$3,657.00
Service	02/06/2025	1106 - Misc Motions & Court Hearings: Review draft obj to WL motion for bonus payments	MPR	0.10	\$795.00	\$79.50
Service	02/06/2025	1110 - Claim Management Issues: review claims info and objs w/CAR (.2); mtg w/CAR re Computershare claim issues (.2);	MPR	0.40	\$795.00	\$318.00
Service	02/06/2025	1105 - Plan & Disclosures: review and revise portions of disclosure statement and plan regarding Computershare and White Lodging, consistent with claim objections	CAR	1.20	\$625.00	\$750.00

Service	02/06/2025	1110 - Claim Management Issues: review loan documents provided by lender (1.3); prepare email to Attorney F DiCatri regarding position on objection to claim (.5)	CAR	1.80	\$625.00	\$1,125.00
Service	02/06/2025	1105 - Plan & Disclosures: Continue working on plan and disclosure statement including review of information on contracts to assume or assign and cure amounts (.8); preparing revisions to claims spreadsheet as exhibit to (.8); and preparing revisions to disclosure statement and plan (1.6).	EMR	3.20	\$495.00	\$1,584.00
Service	02/07/2025	1105 - Plan & Disclosures: Further revise and finalize class ballots to accept or reject Plan (.3); review, modify and finalize exhibits for filing of Disclosure Statement and Chapter 11 plan (1.3)	DTF	1.60	\$250.00	\$400.00
Service	02/07/2025	1105 - Plan & Disclosures: Final detailed reviews/edits of plan and disclosure statement	MPR	4.60	\$795.00	\$3,657.00
Service	02/07/2025	1110 - Claim Management Issues: review and respond to email from Attorney F DiCatri regarding extension for response to claim objection	CAR	0.10	\$625.00	\$62.50
Service	02/07/2025	1105 - Plan & Disclosures: Prepare final revisions to proposed Plan and Disclosure Statement and exhibits to same to prepare for filing.	EMR	4.00	\$495.00	\$1,980.00
Service	02/09/2025	1105 - Plan & Disclosures: prep of email to M. Driscoll, Marriott counsel, re plan and DS filings	MPR	0.10	\$795.00	\$79.50
Service	02/09/2025	1110 - Claim Management Issues: Review A. Daleo letter re alleged discovery insufficiencies and prep of response	MPR	0.90	\$795.00	\$715.50
Service	02/10/2025	1110 - Claim Management Issues: Review proofs of claim of White Lodging and Marriott to determine overlap of amounts claimed for franchise fees (.2); review discovery responses of White Lodging with document production to assess White Lodging's spreadsheet calculations of amounts claimed and for supplementing debtor's discovery	DTF	0.60	\$250.00	\$150.00

responses (.4)						
Service	02/10/2025	1104 - DIP Financing / Cash Collateral: Prepare revisions to drafting Objection to White Lodging's Motion	DJC	2.70	\$225.00	\$607.50
Service	02/10/2025	1108 - Employment, Billing & Compensation: Review January 2024 R&R invoice, and draft and finalize R&R fee statement for January 2025 (.4); begin review of R&R invoices from September through December 2024 and prepare spreadsheet by category of costs, in support of second interim fee application (1.7)	DTF	2.10	\$250.00	\$525.00
Service	02/10/2025	1110 - Claim Management Issues: Work on response to Daleo letter re discovery in connection with obj to WL claims, including review of prior discovery responses of WL (1.8); emails w/D. Friedland and J. Cordova re WL discovery and claims calculations (.2)	MPR	2.00	\$795.00	\$1,590.00
Service	02/10/2025	1104 - DIP Financing / Cash Collateral: work on objection to WL motion for cash collateral to pay bonuses	MPR	1.10	\$795.00	\$874.50
Service	02/10/2025	1110 - Claim Management Issues: Review and approve proposed Stipulation with Computershare to extend Computershare's deadline to respond to Debtor's objection to its claim (.2); prepare email to counsel for Computershare advising of same (.1).	EMR	0.30	\$495.00	\$148.50
Service	02/10/2025	1108 - Employment, Billing & Compensation: Review and finalize January billing statements for submission for payment pursuant to Alternative Interim Compensation Procedures.	EMR	0.70	\$495.00	\$346.50
Service	02/11/2025	1104 - DIP Financing / Cash Collateral: Prepare further revisions to Objection to White Lodging's Motion	DJC	2.90	\$225.00	\$652.50
Service	02/11/2025	1104 - DIP Financing / Cash Collateral: Research for objection to motion	DJC	0.60	\$225.00	\$135.00
Service	02/11/2025	1108 - Employment, Billing & Compensation:	DTF	2.40	\$250.00	\$600.00

		Continue review of R&R invoices from September through December 2024 and prepare spreadsheet by category of costs, and begin drafting second interim fee application				
Service	02/11/2025	1112 - Debtor Meetings & Communications: client team zoom mtg on status/strategy	MPR	0.60	\$795.00	\$477.00
Service	02/12/2025	1104 - DIP Financing / Cash Collateral: Conduct additional research for basis for Objection to White Lodging's Motion	DJC	2.30	\$225.00	\$517.50
Service	02/12/2025	1104 - DIP Financing / Cash Collateral: Continue conducting additional research for Objection to White Lodging's Motion	DJC	1.60	\$225.00	\$360.00
Service	02/12/2025	1110 - Claim Management Issues: Prepare preliminary drafts of supplemental responses to White Lodging's interrogatories and requests for production re: claim objections	DTF	0.50	\$250.00	\$125.00
Service	02/12/2025	1104 - DIP Financing / Cash Collateral: Work on obj to WL motion for cash collateral to pay bonuses, and related emails to F. DiCastrì and M. Flaherty re same	MPR	1.40	\$795.00	\$1,113.00
Service	02/12/2025	1110 - Claim Management Issues: emails w/A. Daleo re WL discovery and claim issues, and related t/conf w/M. Flaherty and J. Cordova	MPR	0.40	\$795.00	\$318.00
Service	02/12/2025	1108 - Employment, Billing & Compensation: Prepare email to Jennifer Cordova and Deborah Friedland advising of status of filing fee applications for certain estate professionals.	EMR	0.20	\$495.00	\$99.00
Service	02/13/2025	1104 - DIP Financing / Cash Collateral: Continue research for Objection to White Lodging's Motion	DJC	1.00	\$225.00	\$225.00
Service	02/13/2025	1110 - Claim Management Issues: Further revise and update draft supplemental responses to White Lodging's discovery requests re: claim objections	DTF	1.10	\$250.00	\$275.00
Service	02/13/2025	1108 - Employment, Billing & Compensation: Continue drafting	DTF	3.50	\$250.00	\$875.00

		second interim fee application of Richman & Richman and preparation of exhibits				
Service	02/13/2025	1110 - Claim Management Issues: T/ conf w/A. Daleo re discovery issues	MPR	0.10	\$795.00	\$79.50
Service	02/13/2025	1104 - DIP Financing / Cash Collateral: review/edit obj to WL bonus motion	MPR	0.20	\$795.00	\$159.00
Service	02/14/2025	1108 - Employment, Billing & Compensation: Continue preparing draft of R&R second interim fee application and preparation of all exhibits.	DTF	2.80	\$250.00	\$700.00
Service	02/14/2025	1104 - DIP Financing / Cash Collateral: Review J. Halfenger order on WL bonus motion and related emails	MPR	0.20	\$795.00	\$159.00
Service	02/14/2025	1106 - Misc Motions & Court Hearings: Review White Lodging's Motion for Relief from Stay to Provide WARN Act Notices to Hotel Employees (.4); prepare email to MPR and CAR forwarding same for their review and information (.1); review federal and WI WARN Act Notice requirements (.4).	EMR	0.90	\$495.00	\$445.50
Service	02/14/2025	1108 - Employment, Billing & Compensation: Continue preparing First Interim Fee Applications of Sikich LLC and ICAP Development LLC (.8); prepare email to MPR and Jennifer Maldonado forwarding same for review (.1).	EMR	0.90	\$495.00	\$445.50
Service	02/15/2025	1110 - Claim Management Issues: review WL Warn Act motion, court order re same, prep of email summary of court orders and related status for client team (.8); review Wisconsin WARN Act statute applicability (.2)	MPR	1.00	\$795.00	\$795.00
Service	02/15/2025	1104 - DIP Financing / Cash Collateral: review Jan – June draft budget/fees etc for cash collateral; related email to D. Friedland and W. Petersen	MPR	0.20	\$795.00	\$159.00
Service	02/15/2025	1106 - Misc Motions & Court Hearings: Conduct email exchange with MPR regarding provisions of	EMR	0.40	\$495.00	\$198.00

federal and Wisconsin WARN Act.						
Service	02/17/2025	1108 - Employment, Billing & Compensation: Revise and update R&R second interim fee application and preparation of all exhibits.	DTF	1.80	\$250.00	\$450.00
Service	02/17/2025	1108 - Employment, Billing & Compensation: Prepare draft second supplemental declaration of MPR in support of app to employ R&R re: billing rate increases	DTF	0.70	\$250.00	\$175.00
Service	02/17/2025	1108 - Employment, Billing & Compensation: Review and prepare revisions to Richman & Richman's Second Interim Fee Application (.8); review and revise 2nd Supplemental Declaration of MPR in Support of Application to Employ to inform of R&R rate change (.2).	EMR	1.00	\$495.00	\$495.00
Service	02/18/2025	1108 - Employment, Billing & Compensation: Revise and finalize draft second supplemental declaration in support of app to employ R&R as to increasing billing rates (.3); review draft second interim R&R fee application for additional revisions and edits per prior monthly invoices (.4)	DTF	0.60	\$250.00	\$150.00
Service	02/18/2025	1108 - Employment, Billing & Compensation: review and advise change to declaration of Richman & Richman employment application (.2); review and revise 2nd Application Fee Application for filing with Court (.4)	CAR	0.60	\$625.00	\$375.00
Service	02/18/2025	1108 - Employment, Billing & Compensation: Update Fee App re: LWHA fee application at flat rate.	KKH	0.40	\$225.00	\$90.00
Service	02/18/2025	1110 - Claim Management Issues: Emails re WARN act issues w/A. Daleo and client team	MPR	0.20	\$795.00	\$159.00
Service	02/18/2025	1106 - Misc Motions & Court Hearings: Continue conducting legal research on WARN Act to address White Lodging's pending Motion for Relief from Stay.	EMR	0.40	\$495.00	\$198.00
Service	02/19/2025	1108 - Employment, Billing & Compensation: Revise, finalize and file second interim fee application of R&R with exhibits and notice to	DTF	1.80	\$250.00	\$450.00

creditors						
Service	02/19/2025	1106 - Misc Motions & Court Hearings: Emails w/client team re WARN act issues and potential resolution (.1); review WL reply on bonus motion issues and prep of email to client team re same (.2)	MPR	0.30	\$795.00	\$238.50
Service	02/20/2025	1110 - Claim Management Issues: T/ conf w/F. DiCastrì re WL bonus motion reply and position on WL claims objection (.3); review bonus issue notes from EA and J. Cordova and prep of email re same (.2)	MPR	0.50	\$795.00	\$397.50
Service	02/20/2025	1106 - Misc Motions & Court Hearings: court telephonic status conference on plan and DS and claims litigation (1.0); review DiCastrì email on scheduling and prep of reply (.1)	MPR	1.10	\$795.00	\$874.50
Service	02/20/2025	1112 - Debtor Meetings & Communications: t/conf w/M. Flaherty re mtg w/WL (.2); client team zoom re status/strategy and results of court hearing (.3)	MPR	0.50	\$795.00	\$397.50
Service	02/20/2025	1108 - Employment, Billing & Compensation: Review and finalize Second Interim Fee Application of EA Group and Notice of same.	EMR	0.40	\$495.00	\$198.00
Service	02/20/2025	1108 - Employment, Billing & Compensation: Prepare email to Jordan Vorlob at Sikich LLC sending First Interim Fee Application for his final review and signature.	EMR	0.20	\$495.00	\$99.00
Service	02/20/2025	1108 - Employment, Billing & Compensation: Prepare email to Shaun Geracie at ICAP Development sending First Interim Fee Application for his final review and signature.	EMR	0.20	\$495.00	\$99.00
Service	02/21/2025	1108 - Employment, Billing & Compensation: Finalize and file second interim fee application of EA Group with invoices exhibit and notice for filing (.7); finalize and file first interim fee application of ICAP with invoices exhibit and notice for filing (.6); finalize and file first interim fee application of Sikich with invoices exhibit and notice for filing (.6)	DTF	1.90	\$250.00	\$475.00

Service	02/21/2025	1102 - Case Administration / US Trustee: Finalize monthly operating report with supporting documentation for filing (.3); email exchange with client and EA Group re: MOR filing (.1)	DTF	0.40	\$250.00	\$100.00
Service	02/21/2025	1112 - Debtor Meetings & Communications: Prep of email report to client team on 2/20 court hearing and related call w/M. Flaherty (.3); prep of report to client team re WL dispute on bonuses and WARN Act (.1)	MPR	0.40	\$795.00	\$318.00
Service	02/21/2025	1110 - Claim Management Issues: t/ conf w/N. Brown re WL position on bonuses and WARN act notices (.2); prep of email to F. DiCastrì re same (.3); prep of cease and desist email to N. Brown re threatened communications on WARN act and bonuses (.7); review N. Brown reply to cease and desist email, and prep of response to same (.3)	MPR	1.50	\$795.00	\$1,192.50
Service	02/21/2025	1108 - Employment, Billing & Compensation: Finalize first interim applications for ICAP Development and Sikich LLC, including final review of invoices for both firms (.2); and prepare final revisions to application of Sikich LLC (.2).	EMR	0.40	\$495.00	\$198.00
Service	02/24/2025	1110 - Claim Management Issues: Confer with MPR and prepare documents for review in support of analysis re: White Lodging discovery and claim objections ongoing litigation	DTF	0.20	\$250.00	\$50.00
Service	02/24/2025	1112 - Debtor Meetings & Communications: T/conf w/R. Erkert re status/strategy (.2); teams mtg w/ D. Friedland and W. Pederson re mgmt. co. rfp and Marriott franchise agreement issues (.2);	MPR	0.40	\$795.00	\$318.00
Service	02/24/2025	1104 - DIP Financing / Cash Collateral: prep of email to F. DiCastrì re budget matters, and related email to client team	MPR	0.20	\$795.00	\$159.00
Service	02/24/2025	1110 - Claim Management Issues: work on supp discovery to White Lodging	MPR	1.20	\$795.00	\$954.00
Service	02/24/2025	1102 - Case Administration / US	MPR	0.10	\$795.00	\$79.50

Trustee: review Court order of 2/21, following 2/20 status conf						
Service	02/24/2025	1105 - Plan & Disclosures: review client team responses to DS questions from V. Morelli (UST) via 2/12 email; and prep of reply to Morelli (.2)	MPR	0.20	\$795.00	\$159.00
Service	02/25/2025	1110 - Claim Management Issues: Review, update, and finalize supplemental responses to White Lodging's discovery requests re: claim objections.	DTF	0.30	\$250.00	\$75.00
Service	02/25/2025	1110 - Claim Management Issues: Finalize supp interrog responses to WL and prep of email to A. Daleo re same	MPR	0.30	\$795.00	\$238.50
Service	02/26/2025	1110 - Claim Management Issues: Zoom mtg w/D. Friedland, W. Petersen re expert report for WL claims objections	MPR	0.20	\$795.00	\$159.00
Service	02/27/2025	1112 - Debtor Meetings & Communications: Zoom mtg w/client team on status/strategy	MPR	0.20	\$795.00	\$159.00
Service	02/28/2025	1110 - Claim Management Issues: review draft report by D. Friedland on White Lodging claims valuation issues (.5); finalize filing details and transmittal service email (.1)	MPR	0.60	\$795.00	\$477.00
Service	02/28/2025	1105 - Plan & Disclosures: preliminary review of Lenders' appraisal and prep of email to client team re same	MPR	0.20	\$795.00	\$159.00
Quantity Subtotal						107.2

Time Keeper	Position	Quantity	Rate	Total
Eliza Reyes	Associate	20.0	\$495.00	\$9,900.00
Claire Richman	Partner	3.7	\$625.00	\$2,312.50
Michael Richman	Partner	37.7	\$795.00	\$29,971.50
Dian Cai	Law Clerk	21.2	\$225.00	\$4,770.00
David Fowle	Paralegal	23.6	\$250.00	\$5,900.00
Kiranpreet Hayer	Paralegal	0.4	\$225.00	\$90.00

Jude Odibeli	Law Clerk	0.6	\$195.00	\$117.00
			Quantity Total	107.2
			Subtotal	\$53,061.00
			Total	\$53,061.00

ALL BILLS DUE & PAYABLE UPON RECEIPT UNLESS ARRANGEMENTS ARE MADE WITH COUNSEL.

Please make all amounts payable to: Richman & Richman LLC

Check/Cash Payments: Mail to 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732

Credit Card Payments: Via CLIO Pay at www.RandR.law (or attached link)

Wire Instructions: Account Name: Richman & Richman LLC (General Checking)
 Account Address: 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732
 Bank Name and Address: BMO Harris Bank
 ABA: 071025661 SWIFT Code HATRUS44 Acct No. 4838178298